

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAUNCEY ERIN HOWARD,
[DOB: 08/23/1984]

Defendant.

No. 2:21-cr-4007-SRB

COUNT 1

18 U.S.C. § 922(g)(1)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 2

18 U.S.C. § 924(c)(1)(A)(i)
NLT 5 Years and NMT Life Imprisonment
(Consecutive to Count 1)
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class A Felony

\$100 Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Felon in Possession of a Firearm)

18 U.S.C. § 922(g)(1)

On or about July 22, 2020, within Boone County, in the Western District of Missouri, the defendant, **CHAUNCEY ERIN HOWARD**, knowing he had previously been convicted of a crime punishable for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms, that is, Taurus, model G3, 9mm, semi-automatic handgun, serial number ABD471224, S.C. Nova Grup S.R.L, model NAK-9, 9mm semi-automatic handgun, serial number RNVMB71918076, and Smith & Wesson, model SD40VE, .40 caliber semi-automatic handgun, serial number FCJ8530; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2
(Possession of a Firearm in Furtherance
Of a Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)(i)

Between dates, July 6, 2020, until July 22, 2020, said dates being approximate, within Boone County, in the Western District of Missouri, and elsewhere, the defendant, **CHAUNCEY ERIN HOWARD**, knowingly possessed firearms, those are, Taurus, model G3, 9mm, semi-automatic handgun, serial number ABD471224, S.C. Nova Grup S.R.L, model NAK-9, 9mm semi-automatic handgun, serial number RNVMB71918076, and Smith & Wesson, model SD40VE, .40 caliber semi-automatic handgun, serial number FCJ8530, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute marijuana; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL.

/S/ Eugene O'Loughlin
FOREPERSON OF THE GRAND JURY

/S/ Ashley S. Turner
ASHLEY S. TURNER
Assistant United States Attorney
Missouri Bar No. 62314

Dated: 02/25/2021